

REMARKS

In response to the above-identified Final Office Action, Applicant seeks reconsideration in view of the following remarks. In this Response, Applicant does not amend, cancel, or add any new claims. Accordingly, claims 1-28 remain pending in the Application.

I. Claims Rejected Under 35 U.S.C. § 103

A. Reitmeier in view of Cooper

Claims 1, 4, 7-8, 11-13, 19 and 26 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,118,498 issued to Reitmeier (“*Reitmeier*”) in view of U.S. Patent Application Publication No. 2004/0003399 filed by Cooper (“*Cooper*”). Applicant respectfully traverses the rejection.

To render a claim obvious, the cited references must disclose each and every element of the rejected claim (*see* MPEP § 2143). Among other elements, amended claim 1 defines an apparatus for display of video data from a plurality of video sources comprising “a plurality of video decoders configured to be coupled to different video sources.” Applicant submits that the combination of *Reitmeier* and *Cooper* fails to disclose at least these elements of claim 1.

In making the rejection, the Patent Office admits that *Reitmeier* “does not specifically disclose a plurality of video sources, or video decoders coupled to different video sources” (Paper No./Mail Date 20080311, page 3). Moreover, in reviewing *Reitmeier* Applicant is unable to discern any sections of *Reitmeier* disclosing such elements. Therefore, *Reitmeier* fails to disclose at “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1. The Patent Office relies on the disclosure in *Cooper* to cure the defects of *Reitmeier*; however, Applicant submits that *Cooper* fails to cure such defects.

The Patent Office characterizes *Cooper* as disclosing “a plurality of video sources (see Fig. 4), and video decoders coupled to different video sources (see Fig. 4)” (Paper No./Mail Date 20080311, page 3, parentheticals in original). Applicant respectfully disagrees with the Patent Office’s characterization of the disclosure in *Cooper*.

Cooper discloses “television channel surfing in a system utilizing compressed video on multiple channels” (*Cooper*, paragraph [0002]). Applicant reproduces below FIG. 1 of *Cooper*.

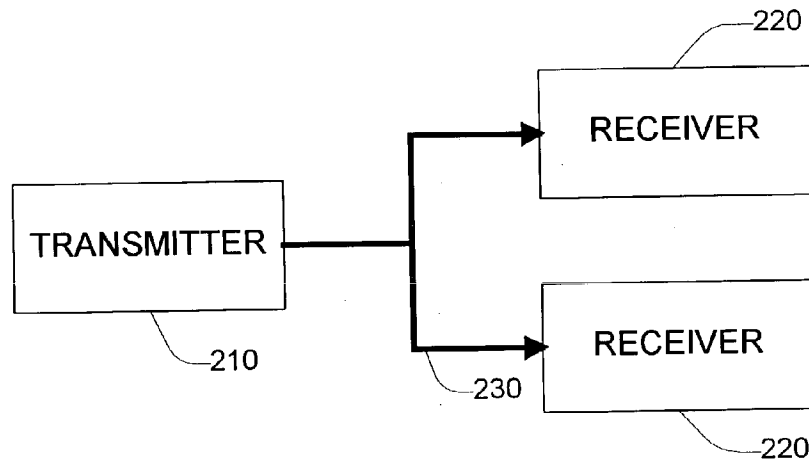


FIG. 1

In FIG. 1, *Cooper* illustrates a typical television broadcast system having a transmitter (reference numeral 210) for transmitting “television signals across a transmission medium 230 to one or more receivers 220, where television programs are displayed” (*Cooper*, paragraph [0034], emphasis added). That is, *Cooper* discloses a system where each receiver 220 is connected to a single transmitter 210. With reference now to FIG. 2 of *Cooper*, “this FIG. comprises a receiver 220 and a viewer 20 controlling the receiver 220...” (*Cooper*, paragraph [0035]). Receiver 220 includes two tuners (reference numerals 30 and 80) connected to an antenna (reference numeral 10), but “additional tuners and/or antennae are also within the scope of the invention (*Cooper*, paragraph [0036]). That is, the text associated with FIG. 2 discloses that other embodiments of receiver 220 may include more than one antenna 10 for communicating with transmitter 210. Applicant submits that FIG. 4 of *Cooper* illustrates one such embodiment.

Cooper discloses that FIG. 4 illustrates “a third embodiment of the present invention which includes elements 10-100 as described in respect to FIGS. 2 and 3, and further includes alternate or second antenna 14...” connected to tuner 30 and/or 80 (*Cooper*, paragraph [0045]; and see FIG. 4). “As with FIGS. 2 and 3, FIG. 4 comprises a receiver 220 and a viewer 20 for controlling the receiver 220...” (*Id.*). That is, Applicant submits that FIG. 4 of *Cooper* discloses a third embodiment for the one or more receivers 220 that *Cooper* disclosed in FIG. 1. Specifically, Applicant acknowledges that FIG. 4 of *Cooper* does indeed show a second antenna 14; however, *Cooper* does disclose that antenna 14 receives signals from any source other than transmitter 210. In other words, *Cooper* discloses that each receiver 220 disclosed in the television broadcast system receives television signals from a single source, transmitter 210. Because *Cooper* discloses a television broadcast system having a single transmitter 210 supplying signals to one or more receivers 220, *Cooper* fails to disclose at least “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1. Therefore, *Cooper* fails to cure the defects of *Reitmeier*.

The failure of the combination of *Reitmeier* and *Cooper* to teach or suggest each and every element of claim 1 is fatal to the obviousness rejection. Therefore, claim 1 is not obvious over *Reitmeier* in view of *Cooper*. Accordingly, Applicant respectfully requests withdrawal of the rejection of independent claim 1.

Claim 4 depends from claim 1 and includes all of the elements thereof. Therefore, Applicant submits that claim 4 is not obvious over the combination of *Reitmeier* and *Cooper* at least for the same reasons as claim 1, in addition to its own unique features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 4.

Referring to the rejection of claim 7, claim 7 defines a method comprising “receiving video data from each of the plurality of video sources” and “decoding, with a plurality of video decoders, at least a portion of the video data received from the plurality of video sources” similar to the elements of “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1. Therefore, Applicant submits that the discussion above regarding the combination of *Reitmeier* and *Cooper* failing to disclose at least the elements of “a plurality of video

decoders configured to be coupled to different video sources” recited in claim 1 is equally applicable to similar elements recited in claim 7. Therefore, Applicant submits that claim 7 is not obvious over the combination of *Reitmeier* and *Cooper* at least for the same reasons as claim 1, in addition to its own unique features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 7.

Claims 11-13 depend from claim 7 and include all of the elements thereof. Therefore, Applicant submits that claims 11-13 are not obvious over the combination of *Reitmeier* and *Cooper* at least for the same reasons as claim 7, in addition to their own respective features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 11-13.

Referring to the rejection of claim 19, claim 19 defines a system comprising “a plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data via one of a plurality of video channels” similar to the elements of “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1. Therefore, Applicant submits that the discussion above regarding the combination of *Reitmeier* and *Cooper* failing to disclose at least the elements of “a plurality of video decoders configured to be coupled to different video sources” recited in claim 1 is equally applicable to similar elements recited claim 19. Therefore, Applicant submits that claim 19 is not obvious over the combination of *Reitmeier* and *Cooper* at least for the same reasons as claim 1, in addition to its own unique features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 19.

Claim 26 depends from claim 19 and includes all of the elements thereof. Therefore, Applicant submits that claim 26 is not obvious over the combination of *Reitmeier* and *Cooper* at least for the same reasons as claim 19, in addition to their own respective features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 26.

B. *Reitmeier* in view of *Cooper*, *Machida*, and *Itoh*

Claims 2-3 and 20-21 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Cooper*, European Patent No. EP 1,158,788 issued to Machida et al.

(“*Machida*”), and U.S. Patent No. 6,487,719 issued to Itoh (“*Itoh*”). Applicant respectfully traverses the rejection.

Claims 2-3 depend from independent claim 1 and claims 20-21 depend from independent claim 19, and include all of the elements of their respective independent claims. In rejecting claims 2-3 and 20-21, the Patent Office characterizes *Reitmeier* and *Cooper* similar to the rejection of claims 1 and 19 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Cooper* to teach or suggest at least “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1 and similarly recited in claim 19, and respectfully submits that such discussion is equally applicable to claims 2-3 and 20-21 because of their respective dependencies from claims 1 and 19. The Patent Office relies on the disclosures in *Machida* and *Itoh* to cure the defects of *Reitmeier* and *Cooper*; however, Applicant submits that *Machida* and *Itoh* individually and in combination fail to cure such defects.

In making the rejection, the Patent Office does not cite *Machida* nor *Itoh* as disclosing “a plurality of video decoders configured to be coupled to different video sources” recited in claim 1 and similarly recited in claim 19. Moreover, in reviewing *Machida* and *Itoh* Applicant is unable to discern any sections in either *Machida* or *Itoh* disclosing such elements. Therefore, *Machida* and *Itoh* fail to cure the defects of *Reitmeier* and *Cooper*.

The failure of the combination of *Reitmeier*, *Cooper*, *Machida*, and *Itoh* to disclose each and every element of claims 2-3 and 20-21 is fatal to the obviousness rejection. Therefore, claims 2-3 and 20-21 are not obvious over *Reitmeier* in view of *Cooper*, *Machida*, and *Itoh*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 2-3 and 20-21.

C. *Reitmeier* in view of *Cooper* and *Machida*

Claims 5 and 22 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Cooper*, and *Machida*. Applicant respectfully traverses the rejection.

Claim 5 depends from independent claim 1 and claim 22 depends from independent claim 19, and include all of the elements of their respective independent claims. In rejecting claims 5 and 22,

the Patent Office characterizes *Reitmeier* and *Cooper* similar to the rejection of claims 1 and 19 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Cooper* to teach or suggest at least “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1 and similarly recited in claim 19, and respectfully submits that such discussion is equally applicable to claims 5 and 22 because of their respective dependencies from claims 1 and 19. The Patent Office relies on the disclosure in *Machida* to cure the defects of *Reitmeier* and *Cooper*; however, Applicant submits that *Machida* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Machida* as disclosing “a plurality of video decoders configured to be coupled to different video sources” recited in claim 1 and similarly recited in claim 19. Moreover, in reviewing *Machida* Applicant is unable to discern any sections in *Machida* disclosing such elements. Therefore, *Machida* fails to cure the defects of *Reitmeier* and *Cooper*.

The failure of the combination of *Reitmeier*, *Cooper*, and *Machida* to disclose each and every element of claims 5 and 22 is fatal to the obviousness rejection. Therefore, claims 5 and 22 are not obvious over *Reitmeier* in view of *Cooper* and *Machida*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 5 and 22.

D. *Reitmeier* in view of *Cooper* and *Miyazaki*

Claims 6, 9-10, 14, and 27-28 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Cooper* and U.S. Patent No. 5,883,676 issued to Miyazaki et al. (“*Miyazaki*”). Applicant respectfully traverses the rejection.

Claims 6, 9-10, and 27-28 depend from independent claims 1, 7, and 19, respectively, and include all of the elements of their respective independent claims. In rejecting claims 6, 9-10, and 27-28 the Patent Office characterizes *Reitmeier* and *Cooper* similar to the rejection of claims 1, 7, and 19 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Cooper* to teach or suggest at least “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1 and similarly recited in claims 7 and 19, and

respectfully submits that such discussion is equally applicable to claims 6, 9-10, and 27-28 because of their respective dependencies from claims 1, 7, and 19. The Patent Office relies on the disclosure in *Miyazaki* to cure the defects of *Reitmeier* and *Cooper*; however, Applicant submits that *Miyazaki* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Miyazaki* as disclosing “a plurality of video decoders configured to be coupled to different video sources” recited in claim 1 and similarly recited in claims 7 and 19. Moreover, in reviewing *Miyazaki* Applicant is unable to discern any sections in *Miyazaki* disclosing such elements. Therefore, *Miyazaki* fails to cure the defects of *Reitmeier* and *Cooper*.

The failure of the combination of *Reitmeier*, *Cooper*, and *Miyazaki* to disclose each and every element of claims 6, 9-10, and 27-28 is fatal to the obviousness rejection. Therefore, claims 6, 9-10, and 27-28 are not obvious over *Reitmeier* in view of *Cooper* and *Miyazaki*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 6, 9-10, and 27-28.

Referring to the rejection of claim 14, claim 14 defines a system comprising “receiving the video data from the plurality of video sources at a first video decoder and a second video decoder” similar to the elements of “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1. Therefore, Applicant submits that the discussion above regarding the combination of *Reitmeier* and *Cooper* failing to disclose at least the elements of “a plurality of video decoders configured to be coupled to different video sources” recited in claim 1 is equally applicable to similar elements recited claim 14. Therefore, Applicant submits that claim 14 is not obvious over the combination of *Reitmeier* and *Cooper* at least for the same reasons as claim 1, in addition to its own unique features. The Patent Office relies on the disclosure in *Miyazaki* to cure the defects of *Reitmeier* and *Cooper*; however, Applicant submits that *Miyazaki* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Miyazaki* as disclosing “receiving the video data from the plurality of video sources at a first video decoder and a second video decoder” as recited in claim 14. Moreover, in reviewing *Miyazaki* Applicant is unable to discern any sections

in *Miyazaki* disclosing such elements. Therefore, *Miyazaki* fails to cure the defects of *Reitmeier* and *Cooper*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 14.

E. *Reitmeier* in view of *Cooper*, *Miyazaki*, and *Miura*

Claims 15-17 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Cooper*, *Miyazaki*, and U.S. Patent No. 6,456,335 issued to Miura et al. ("*Miura*"). Applicant respectfully traverses the rejection.

Claims 15-17 depend from claim 14 and include all of the elements thereof. In rejecting claims 15-17 the Patent Office characterizes *Reitmeier*, *Cooper*, and *Miyazaki* similar to the rejection of claim 14 discussed above. Applicant has discussed the failure of the combination of *Reitmeier*, *Cooper*, and *Miyazaki* to teach or suggest at least "receiving the video data from the plurality of video sources at a first video decoder and a second video decoder" as recited in claim 14, and respectfully submits that such discussion is equally applicable to claims 15-17 because of their dependency from claim 14. The Patent Office relies on the disclosure in *Miura* to cure the defects of *Reitmeier*, *Cooper*, and *Miyazaki*; however, Applicant submits that *Miura* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Miura* as disclosing "receiving the video data from the plurality of video sources at a first video decoder and a second video decoder" as recited in claims 15-17 via claim 14. Moreover, in reviewing *Miura* Applicant is unable to discern any sections in *Miura* disclosing such elements. Therefore, *Miura* fails to cure the defects of *Reitmeier*, *Cooper*, and *Miyazaki*.

The failure of the combination of *Reitmeier*, *Cooper*, *Miyazaki*, and *Miura* to disclose each and every element of claims 15-17 is fatal to the obviousness rejection. Therefore, claims 15-17 are not obvious over *Reitmeier* in view of *Cooper*, *Miyazaki*, and *Miura*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 15-17.

F. *Reitmeier* in view of *Cooper*, *Miyazaki*, and *Machida*

Claim 18 stands rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Cooper*, *Miyazaki*, and *Machida*. Applicant respectfully traverses the rejection.

Claim 18 depends from claim 14 and includes all of the elements thereof. In rejecting claim 14 the Patent Office characterizes *Reitmeier*, *Cooper*, and *Miyazaki* similar to the rejection of claim 14 discussed above. Applicant has discussed the failure of the combination of *Reitmeier*, *Cooper*, and *Miyazaki* to teach or suggest at least “receiving the video data from the plurality of video sources at a first video decoder and a second video decoder” as recited in claim 14, and respectfully submits that such discussion is equally applicable to claim 18 because of its dependency from claim 14. The Patent Office relies on the disclosure in *Machida* to cure the defects of *Reitmeier*, *Cooper*, and *Miyazaki*; however, Applicant submits that *Machida* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Machida* as disclosing “receiving the video data from the plurality of video sources at a first video decoder and a second video decoder” as recited in claim 18 via claim 14. Moreover, in reviewing *Machida* Applicant is unable to discern any sections in *Machida* disclosing such elements. Therefore, *Machida* fails to cure the defects of *Reitmeier*, *Cooper*, and *Miyazaki*.

The failure of the combination of *Reitmeier*, *Cooper*, *Miyazaki*, and *Machida* to disclose each and every element of claim 18 is fatal to the obviousness rejection. Therefore, claim 18 is not obvious over *Reitmeier* in view of *Cooper*, *Miyazaki*, and *Machida*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 18.

G. *Reitmeier* in view of *Cooper* and *Miura*

Claims 23-25 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Cooper* and *Miura*. Applicant respectfully traverses the rejection.

Claims 23-25 depend from claim 19 and include all of the elements thereof. In rejecting claims 23-25 the Patent Office characterizes *Reitmeier* and *Cooper* similar to the rejection of claim 19 discussed above. Applicant has discussed the failure of the combination of *Reitmeier* and *Cooper*

to teach or suggest at least “a plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data via one of a plurality of video channels,” as recited in claim 19 and respectfully submits that such discussion is equally applicable to claims 23-25 because of their dependency from claim 19. The Patent Office relies on the disclosure in *Miura* to cure the defects of *Reitmeier* and *Cooper*; however, Applicant submits that *Miura* fails to cure such defects.

In making the rejection, the Patent Office does not cite *Miura* as disclosing “a plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data via one of a plurality of video channels” recited in claims 23-25 via claim 19. Moreover, in reviewing *Miura* Applicant is unable to discern any sections in *Miura* disclosing such elements. Therefore, *Miura* fails to cure the defects of *Reitmeier* and *Cooper*.

The failure of the combination of *Reitmeier*, *Cooper*, and *Miura* to disclose each and every element of claims 23-25 is fatal to the obviousness rejection. Therefore, claims 23-25 are not obvious over *Reitmeier* in view of *Cooper* and *Miura*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 23-25.

Application No.: 10/699,311
Reply to Final Office Action mailed on 3/19/2008
Reply dated 5/15/2008

CONCLUSION

In view of the foregoing, it is believed that all claims now pending are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (480) 385-5060 or jgraff@ifllaw.com.

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 50-2091 for any fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,

Date: May 15, 2008

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